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1972 ANNOTATED

Issued December 2020

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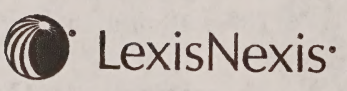

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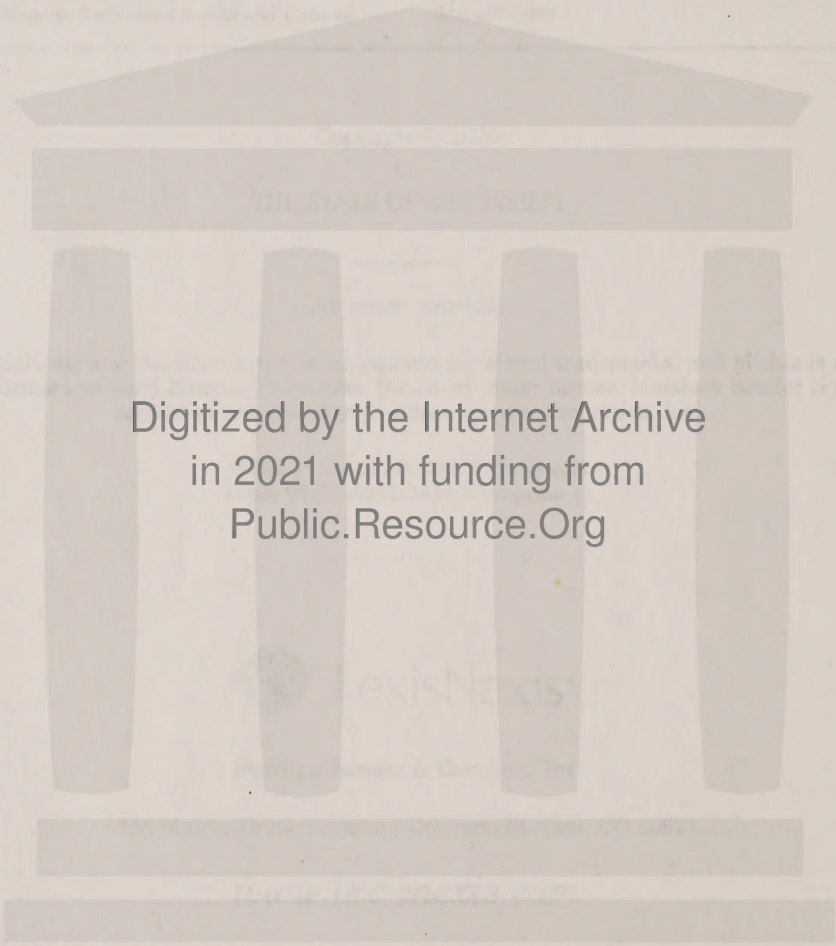
User's Guide

In order to assist both the legal profession and the layman in obtaining the maximum benefit from the Mississippi Code of 1972 Annotated, a User's Guide has been included in the main volume. This guide contains comments and information on the many features found within the Code intended to increase the usefulness of the Code to the user.



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PUBLISHER'S FOREWORD

Statutes

The 2020 Supplement to the Mississippi Code of 1972 Annotated reflects the statute law of Mississippi as amended by the Mississippi Legislature through the end of the 2020 Regular Legislative Session.

Annotations

Case annotations are included based on decisions of the State and federal courts in cases arising in Mississippi. Annotations to collateral research references are also included.

To better serve our customers by making our annotations more current, LexisNexis has changed the sources that are read to create annotations for this publication. Rather than waiting for cases to appear in printed reporters, we now read court decisions as they are released by the courts. A consequence of this more current reading of cases, as they are posted online on LexisNexis, is that the most recent cases annotated may not yet have print reporter citations. These will be provided, as they become available, through later publications.

This publication contains annotations taken from decisions of the Mississippi Supreme Court and the Court of Appeals and decisions of the appropriate federal courts. These cases will be printed in the following reporters:

Southern Reporter, 3rd Series
United States Supreme Court Reports
Supreme Court Reporter
United States Supreme Court Reports, Lawyers' Edition, 2nd Series
Federal Reporter, 3rd Series
Federal Supplement, 3rd Series
Federal Rules Decisions
Bankruptcy Reporter

Additionally, annotations have been taken from the following sources:

American Law Reports, 6th Series
American Law Reports, Federal 2nd
Mississippi College Law Review
Mississippi Law Journal

Finally, published opinions of the Attorney General and opinions of the Ethics Commission have been examined for annotations.

Amendment Notes

Amendment notes detail how the new legislation affects existing sections.

Editor's Notes

Editor's notes summarize subject matter and legislative history of repealed sections, provide information as to portions of legislative acts that have not been codified, or explain other pertinent information.

Joint Legislative Committee Notes

Joint Legislative Committee notes explain codification decisions and corrections of Code errors made by the Mississippi Joint Legislative Committee on Compilation, Revision, and Publication of Legislation.

Tables

The Statutory Tables volume adds tables showing disposition of legislative acts through the 2020 Regular Session.

Index

The comprehensive Index to the Mississippi Code of 1972 Annotated is replaced annually, and we welcome customer suggestions. The foreword to the Index explains our indexing principles, suggests guidelines for successful index research, and provides methods for contacting indexers.

Acknowledgements

The publisher wishes to acknowledge the cooperation and assistance rendered by the Mississippi Joint Legislative Committee on Compilation, Revision, and Publication of Legislation, as well as the offices of the Attorney General and Secretary of State, in the preparation of this supplement.

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SCHEDULE OF NEW SECTIONS

There are no new sections added in this supplement.

Schedule of New Sections

There are no new sections added in this supplement.

MISSISSIPPI CODE
1972
ANNOTATED

VOLUME FOUR

TITLE 13.
EVIDENCE, PROCESS AND JURIES

CHAPTER 3.
PROCESS, NOTICE, AND PUBLICATION

§ 13-3-57. Service on nonresident business not qualified to do business in state; survival of cause of action in case of death or inability to act; service on nonresident executor, administrator, etc.

JUDICIAL DECISIONS

ANALYSIS

3. What constitutes doing business within state.
5. Illustrative cases.

3. What constitutes doing business within state.

In a case involving defendants who operated websites through which Mississippi customers could purchase alcoholic beverages, the Supreme Court found that the doing-business component of the state's long-arm statute was applicable to the defendants. While none of the defendants maintained a physical presence in Mississippi, they nonetheless conducted business in the state by means of their websites, which gave them a virtual presence in the state. Fitch ex rel. State v. Wine Express Inc., 297 So. 3d 224, 2020 Miss. LEXIS 48 (Miss. 2020).

In a case involving defendants who operated websites through which Mississippi customers could purchase alcoholic beverages, the Supreme Court found that each of the defendants had established sufficient minimum contacts with Mississippi and that those contacts related to the State's claims against the defendants. Regardless of the free on board contract terms used by the defendants in their sales contracts, the defendants stood ready and willing to do business with Mississippi residents, and knowingly did do business with Mississippi residents. Fitch ex rel. State v. Wine Express Inc., 297 So. 3d 224, 2020 Miss. LEXIS 48 (Miss. 2020).

5. Illustrative cases.

Motor vehicle accident victim did not properly serve a foreign corporation doing business in Mississippi because the only attempt to serve the corporation was via certified mail on its registered agent, which was located in Mississippi. Hadley v. FedEx Ground Package Sys., Inc., — So. 3d —, 2019 Miss. App. LEXIS 453 (Miss. Ct. App. Sept. 17, 2019).

CHAPTER 5.

JURIES

§ 13-5-26. Jury box; deposit of names drawn from jury wheel; drawing and assignment of jurors; use of computer or electronic device for random selection.

JUDICIAL DECISIONS

2. No deficiency in jury selection.

Jury was properly impaneled because the selected jurors were thoroughly questioned and deemed qualified for service during the voir dire examination and prior to being sworn in. Hall v. State, 295 So. 3d 544, 2019 Miss. App. LEXIS 610 (Miss. Ct. App. 2019).

§ 13-5-87. Laws as to listing, drawing, summoning and impaneling of juries are directory.

JUDICIAL DECISIONS

ANALYSIS

1. In general.
4. Review.

1. In general.

Jury was properly impaneled because the selected jurors were thoroughly questioned and deemed qualified for service during the voir dire examination and prior to being sworn in. Hall v. State, 295 So. 3d 544, 2019 Miss. App. LEXIS 610 (Miss. Ct. App. 2019).

TITLE 15.

LIMITATIONS OF ACTIONS AND PREVENTION OF FRAUDS

Chapter 1. Limitation of Actions. 15-1-1

CHAPTER 1.

LIMITATION OF ACTIONS

Sec.

15-1-83. Limitations applicable to actions founded on real estate appraisal.
15-1-85. Limitations applicable to actions founded on licensed real estate activities.

§ 15-1-7. Limitations applicable to actions to recover land.

JUDICIAL DECISIONS

13. When limitation period runs, generally.

14. —Particular cases.

Because a case was undisputedly an action to recover land and for the imposition of a constructive trust, the proper statutes of limitations to be applied granted ten years of time, not three; under the statutes of limitations applicable to the case, all of the facts were within the ten-year period, and thus, case was not time-barred. White v. White, — So. 3d —, 2019 Miss. App. LEXIS 618 (Miss. Ct. App. May 21, 2019), cert. dismissed, — So. 3d —, 2020 Miss. LEXIS 111 (Miss. 2020), cert. dismissed, 291 So. 3d 1111, 2020 Miss. LEXIS 196 (Miss. 2020).

§ 15-1-9. Limitations applicable to suits in equity to recover land.

JUDICIAL DECISIONS

6. Running of limitations period, generally.

8. —Particular cases.

Because a case was undisputedly an action to recover land and for the imposition of a constructive trust, the proper statutes of limitations to be applied granted ten years of time, not three; under the statutes of limitations applicable to the case, all of the facts were within the ten-year period, and thus, case was not time-barred. White v. White, — So. 3d —, 2019 Miss. App. LEXIS 618 (Miss. Ct. App. May 21, 2019), cert. dismissed, — So. 3d —, 2020 Miss. LEXIS 111 (Miss. 2020), cert. dismissed, 291 So. 3d 1111, 2020 Miss. LEXIS 196 (Miss. 2020).

§ 15-1-13. Ten years' adverse possession gives title; exceptions.

JUDICIAL DECISIONS

ANALYSIS

1. Possession in general.
2. —Nature of possession, generally.
28. Running of limitation period.
29. Evidence, generally.
33. —Particular cases, evidence sufficient.

1. Possession in general.

2. —Nature of possession, generally.

It was error to find developers adversely possessed real property because the developers' possession was subject to a promissory note and deed of trust. Ray v. O'Possum Ridge Farms, 289 So. 3d 319, 2019 Miss. App. LEXIS 580 (Miss. Ct. App. 2019).

29. Evidence, generally.

33. —Particular cases, evidence sufficient.

Neighbors proved a claim of ownership of disputed land by adverse possession by clear and convincing evidence because, inter alia, the neighbors proved the neighbors exercised exclusive possession of the land for more than ten years by leasing the land for 33 years, before which the neighbors' family had farmed the land. Anderson v. Fisher, 296 So. 3d 124, 2019 Miss. App. LEXIS 578 (Miss. Ct. App. 2019), cert. denied, 293 So. 3d 834, 2020 Miss. LEXIS 231 (Miss. 2020).

§ 15-1-29. Limitations applicable to actions on accounts and unwritten contracts.

JUDICIAL DECISIONS

12. Running of limitation period.

Because the cause of action for breach of the June 23, 2008, loan agreement did not accrue until appellant breached the agreement by failing to make repayment on September 21, 2008, and appellee filed suit on September 16, 2011, within three years of that breach, appellee filed her complaint within the applicable limitations period. Robinson v. Singh, — So. 3d —, 2020 Miss. App. LEXIS 126 (Miss. Ct. App. Apr. 21, 2020), cert. denied, — So. 3d —, 2020 Miss. LEXIS 364 (Miss. 2020).

15. Miscellaneous.

Although a beneficiary of the decedent's will argued that any debt that the beneficiary owed the decedent as stated in a document was more than three years old and, therefore, any collection of that debt was barred by the statute of limitations, the beneficiary argument was misplaced. The decedent's estate was not trying to collect any amount from the beneficiary, but, rather, the estate was simply trying to deduct that debt from the beneficiary's share of the inheritance. Walker v. Brown (In re Estate of Walker), 296 So. 3d 780, 2020 Miss. App. LEXIS 306 (Miss. Ct. App. 2020).

§ 15-1-35. Limitations applicable to actions for certain torts.

JUDICIAL DECISIONS

ANALYSIS

2. Applicability.
4. Assault and battery.

2. Applicability.

Detainee's claims of assault, battery, false arrest, and slander, to the extent they alleged conduct by the sheriff that would fall outside of the MTCA, were barred by this section. Burnett v. Hinds Cty., — So. 3d —, 2020 Miss. LEXIS 357 (Miss. Oct. 1, 2020).

§ 15-1-36. Limitations applicable to malpractice action arising from medical, surgical or other professional services.

JUDICIAL DECISIONS

ANALYSIS

3. Applicability.
4. Discovery rule.
6. Particular cases.

3. Applicability.

In their motion for additional discovery, appellants argued that they needed to secure the hospital's policies and procedures to support what they characterized as their claims of administrative negligence; however, the trial court correctly found that these claims were in fact claims of medical negligence. Webb v. Forrest Gen. Hosp., — So. 3d —, 2020 Miss. App. LEXIS 109 (Miss. Ct. App. Apr. 7, 2020).

4. Discovery rule.

Circuit court properly found that, as of May 30, 2013, plaintiff knew or reasonably should have known of defendant's alleged negligence as the autopsy report did not reveal any act, omission, or neglect by defendant that would have been otherwise known or suspected. The circuit court correctly held the discovery rule did not toll the two-year statute of limitations for the month and two days that plaintiff was waiting on the autopsy report. Roberson v. Amory HMA LLC, — So. 3d —, 2020 Miss. App. LEXIS 57 (Miss. Ct. App. Feb. 25, 2020), cert. denied, — So. 3d —, 2020 Miss. LEXIS 351 (Miss. 2020).

6. Particular cases.

In a case in which the medical student was injured during a clinical skills assessment following the administration of a sacral spring test, the student's claim sounded in medical malpractice because her complaint alleged that she was injured while under her assistant professor's medical care; the professor, who was a doctor, evaluated the student for sacroiliac joint pain and rendered treatment to her; and, although the student and professor shared a student-teacher relationship, rather than a doctor-patient relationship, the professor depended on his specialized knowledge and skill to render the sacral spring test to the student. Murphy v. William Carey Univ., — So. 3d —, 2020 Miss. App. LEXIS 462 (Miss. Ct. App. Aug. 11, 2020).

In a medical-malpractice suit, summary judgment was properly granted in favor of the nurse practitioner and the medical center as the two-year statute-of-limitations period had expired on the patient's claim because no dispute existed that on September 23, 2014, the patient learned that she had a tendon dysfunction and stress fracture in her ankle that had remained previously undiagnosed despite her prior medical treatment, and that her tendon dysfunction and stress fracture would require additional treatment, possibly including surgery; thus, the patient's claim began to run on September 23, 2014, and had already expired when she provided the nurse practitioner and the medical center with pre-suit notice on October 14, 2016. Hawkins v. Jones, 284

So. 3d 827, 2019 Miss. App. LEXIS 547 (Miss. Ct. App. 2019).

§ 15-1-45. Limitations applicable to actions founded on foreign judgments or decrees.

JUDICIAL DECISIONS

ANALYSIS

2. Limitation period as to residents.

2. Limitation period as to residents.

Circuit court properly granted the judgment debtors' motion for relief from judgment in the judgment creditor's action to execute on a foreign judgment and garnish assets belonging to the judgment debtors because the seven-year statute of limitations for judgments from foreign jurisdictions had expired where the judgment creditor enrolled a judgment 10 years after its rendition and three years after the statute of limitations in Mississippi had expired. Will Realty, LLC v. Isaacs, 296 So. 3d 80, 2020 Miss. LEXIS 130 (Miss. 2020).

§ 15-1-49. Limitations applicable to actions not otherwise specifically provided for.

JUDICIAL DECISIONS

ANALYSIS

1. [Reserved for future use.]
15. Torts, generally.
27. Running of limitation period, generally.
28. — Accrual of cause of action; miscellaneous.
29. — —Real property, deeds, etc.
32. — —Banking.
38. — Tolling of statute.
39. Service of process
40. Particular cases; miscellaneous.
42. —Real property, deeds, etc.

15. Torts, generally.

Circuit court did not err by granting partial summary judgment in favor of neighboring property owners because a developer's conspiracy claim fell outside the statute of limitations; the continuing tort doctrine did not apply because the alleged harm reverberated from a single, one-time act or omission. Jourdan River Estates, LLC v. Favre, 278 So. 3d 1135, 2019 Miss. LEXIS 345 (Miss. 2019).

27. Running of limitation period, generally.

28. — Accrual of cause of action; miscellaneous.

Client's legal malpractice case against the client's attorney in the client's divorce case was time-barred because the client waited over three years from learning of a discrepancy in the financial status of the client's former spouse before filing suit against the client's attorney in the divorce case for the attorney's alleged failure to investigate the spouse's finances. Nail v. Wright, — So. 3d —, 2020 Miss. App. LEXIS 514 (Miss. Ct. App. Sept. 8, 2020).

29. — —Real property, deeds, etc.

Because a case was undisputedly an action to recover land and for the imposition of a constructive trust, the proper statutes of limitations to be applied granted ten years of time, not three; under the statutes of limitations applicable to the case, all of the facts were within the ten-year period, and thus, case was not time-barred. White v. White, — So. 3d —,

2019 Miss. App. LEXIS 618 (Miss. Ct. App. May 21, 2019), cert. dismissed, — So. 3d —, 2020 Miss. LEXIS 111 (Miss. 2020), cert. dismissed, 291 So. 3d 1111, 2020 Miss. LEXIS 196 (Miss. 2020).

38. — Tolling of statute.

In an action alleging a financial advisor's alleged malfeasance, the statute of limitations period was tolled until plaintiffs' leaned of the advisor's potential wrongdoing and that the losses might be actionable because plaintiffs asked the advisor about the sizable losses they saw in their accounts, exercising reasonable diligence in seeking information about their losses, and were told that everything was fine, and that their accounts would fully recover. Baker v. Raymond James & Assocs., — So. 3d —, 2020 Miss. App. LEXIS 110 (Miss. Ct. App. Apr. 7, 2020).

In a former employee's Title VII gender discrimination and retaliation suit, the employer's counterclaims against a lawyer and a law firm alleging fraudulent concealment and violation of a duty to disclose arising from their actions on behalf of the former employee were precluded by the three year limitations period of Miss. Code § 15-1-49 because the counterclaims were filed more than three years after the employer's discovery of these claims and three year period and the limitations period was not tolled by the fraudulent concealment doctrine. Snider v. L-3 Communs. Vertex Aero., L.L.C., 946 F.3d 660, 2019 U.S. App. LEXIS 38766 (5th Cir. Miss. 2019)

40. Particular cases; miscellaneous.

Appellant argued that even though the trial court ruled that the general three-year limitations period applied to appellee's claims, the chart included calculations from a seven-month period that fell outside the statute-of-limitations period, yet the trial court did not strike those particular calculations or provide for any other adjustment or explanation to the jury; the chart should not have been allowed into evidence. Waste Mgmt. of Miss. v. Jackson Ramelli Waste LLC, — So. 3d —, 2019 Miss. App. LEXIS 373 (Miss. Ct. App. Aug. 6, 2019), rev'd, — So. 3d —, 2020 Miss. LEXIS 340 (Miss. 2020).

42. —Real property, deeds, etc.

In a case in which the homeowner suffered recurring problems with flash flooding, which caused water to enter his home, the chancery court did not err in granting summary judgment in favor of the neighbors as the homeowner's claim against the neighbors was barred by the three-year statute of limitations because the latest date on which the homeowner discovered the injury was July 3, 2010 - the date of the second flooding incident; and the homeowner amended his suit to add the neighbors as defendants on April 29, 2014, well over three years later. Milam v. Kelly, 282 So. 3d 682, 2019 Miss. App. LEXIS 361 (Miss. Ct. App. 2019), cert. denied, 289 So. 3d 311, 2020 Miss. LEXIS 65 (Miss. 2020), cert. denied, — So. 3d —, 2020 Miss. LEXIS 213 (Miss. 2020).

In a case in which the homeowner suffered recurring problems with flash flooding, which caused water to enter his home, the continuing torts doctrine did not apply because the flooding of the homeowner's home constituted a continual ill effect, not a continual unlawful act. Milam v. Kelly, 282 So. 3d 682, 2019 Miss. App. LEXIS 361 (Miss. Ct. App. 2019), cert. denied, 289 So. 3d 311, 2020 Miss. LEXIS 65 (Miss. 2020), cert. denied, — So. 3d —, 2020 Miss. LEXIS 213 (Miss. 2020).

In a case in which the homeowner suffered recurring problems with flash flooding, which caused water to enter his home, the three-year statute of limitations was not tolled based on the doctrine of fraudulent concealment because the homeowner failed to present evidence showing that the neighbors were aware that their wooden fence and landscaping were the cause of the flash flooding; and the homeowner presented no evidence of an affirmative act by the neighbors to prevent the discovery of his claim. Milam v. Kelly, 282 So. 3d 682, 2019 Miss. App. LEXIS 361 (Miss. Ct. App. 2019), cert. denied, 289 So. 3d 311, 2020 Miss. LEXIS 65 (Miss. 2020), cert. denied, — So. 3d —, 2020 Miss. LEXIS 213 (Miss. 2020).

§ 15-1-59. Saving in favor of persons under disabilities.

1. In General.

Because a conservator failed to create a genuine issue of material fact that the conservator's parent was mentally incompetent at the time when the cause of action for alleged the misappropriation of loan proceeds accrued, the savings clause did not apply. Specifically, a doctor only offered conclusory statements regarding the parent's health without citation to specific facts showing that the parent was of unsound mind at the time the cause of action accrued. Brown-Howle v. Cmty. Bank,—So. 3d —, 2018 Miss. App. LEXIS 527 (Miss. Ct. App. Oct. 23, 2018), cert. denied, 279 So. 3d 1085, 2019 Miss. LEXIS 373 (Miss. 2019).

§ 15-1-67. Effect of fraudulent concealment of cause of action.

JUDICIAL DECISIONS

7. Evidence.

In a case in which the homeowner suffered recurring problems with flash flooding, which caused water to enter his home, the three-year statute of limitations was not tolled based on the doctrine of fraudulent concealment because the homeowner failed to present evidence showing that the neighbors were aware that their wooden fence and landscaping were the cause of the flash flooding; and the homeowner presented no evidence of an affirmative act by the neighbors to prevent the discovery of his claim. Milam v. Kelly, 282 So. 3d 682, 2019 Miss. App. LEXIS 361 (Miss. Ct. App. 2019), cert. denied, 289 So. 3d 311, 2020 Miss. LEXIS 65 (Miss. 2020), cert. denied, — So. 3d —, 2020 Miss. LEXIS 213 (Miss. 2020).

§ 15-1-69. Commencement of new action subsequent to abatement or defeat of original action.

2. Applicability.

Savings statute did not apply because a prior complaint was dismissed without prejudice for want of prosecution. Brown-Howle v. Cmty. Bank, — So. 3d —, 2018 Miss. App. LEXIS 527 (Miss. Ct. App. Oct. 23, 2018), cert. denied, 279 So. 3d 1085, 2019 Miss. LEXIS 373 (Miss. 2019). (Miss. 2019).

§ 15-1-83. Limitations applicable to actions founded on real estate appraisal.

(1) An action based on a real estate appraisal by a person who is or was licensed, certified or registered under Title 73, Chapter 34, Mississippi Code of 1972, on the date of the appraisal must be commenced against the licensed real estate appraiser, certified residential appraiser, certified general real estate appraiser or appraiser trainee who performed the appraisal, or the appraiser's or appraiser trainee's employer, or a firm with which the appraiser or

appraiser's trainee is affiliated, or the lender or appraisal management firm that ordered the appraisal, within five (5) years after the date the appraisal was relied upon or utilized by an intended user or within the time prescribed in Section 15-1-49, whichever is earlier.

(2) This section is inapplicable to any action arising from a real estate appraisal where the licensed real estate appraiser, certified residential appraiser, certified general real estate appraiser, appraiser trainee, the appraiser's or appraiser trainee's employer, a firm with which the appraiser or appraiser's trainee is affiliated, or the lender or appraisal management firm that ordered the appraisal fraudulently inflated the value of the property or colluded with others to fraudulently inflate the value of the property.

HISTORY: Laws, 2020, ch. 377, § 1, eff from and after July 1, 2020.

Cross References — Limitations applicable to actions founded on licensed real estate activities, see § 15-1-85.

§ 15-1-85. Limitations applicable to actions founded on licensed real estate activities.

(1) An action based on actions or omissions to act by a person who is or was licensed as a broker or salesperson under the Real Estate Brokers License Law of 1954, Title 73, Chapter 35, Mississippi Code of 1972, must be commenced against the licensed or formerly licensed person, or a firm with which said person is affiliated, within five (5) years after the date of the consummation of the transaction out of which the action arose or, if not consummated, the date on which the agency relationship out of which the action arose ceased to exist, or within the time prescribed in Section 15-1-49, whichever is earlier, or the date a broker price opinion was relied upon by an intended user.

(2) This section is inapplicable to any action arising from actions or omissions to act by a person who is or was licensed as a broker or salesperson, or a firm with which said person is or was affiliated, where that person or firm fraudulently inflated the value of the property or colluded with others to fraudulently inflate the value of the property.

HISTORY: Laws, 2020, ch. 377, § 2, eff from and after July 1, 2020.

Joint Legislative Committee Note — Pursuant to Section 1-1-109, the Joint Legislative Committee on Compilation, Revision and Publication of Legislation corrected an error in an internal statutory reference in subsection (1) by substituting "Title 73, Chapter 35, Mississippi Code of 1972" for "Title 15, Chapter 1, Mississippi Code of 1972." The Joint Committee ratified the correction at its October 19, 2020, meeting.

Cross References — Limitations applicable to actions founded on real estate appraisal, see § 15-1-83.

CHAPTER 3.
PREVENTION OF FRAUDS

ARTICLE 1.
IN GENERAL.

§ 15-3-1. Certain contracts to be in writing.

JUDICIAL DECISIONS

ANALYSIS

5. Sufficiency of writing, generally.
21. Sale or lease of land, generally.
24. —Oral promises and contracts.
34. —Leases.

5. Sufficiency of writing, generally.

In a breach of contract action stemming from a proposed real estate development, while the agreement was in writing, it failed to sufficiently describe the land to be conveyed, and thus, it was unenforceable under the statute of frauds. Hughes v. Shipp, — So. 3d —, 2020 Miss. App. LEXIS 535 (Miss. Ct. App. Sept. 15, 2020).

34. —Leases.

To the extent that a warehouse owner attempted to rely on a proposed sub-sublease for one-third of the warehouse was evidence of an agreement to split the costs of the sublease, the draft sub-sublease between produce distributors was for a five-year term. Accordingly, any attempt to enforce such an obligation was barred by the Mississippi Statute of Frauds. Boyanton v. Bros. Produce, Inc., — So. 3d —, 2020 Miss. App. LEXIS 501 (Miss. Ct. App. Sept. 1, 2020).